

Exhibit G
Affidavit of Nurse Linda Stewart

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

ANTONIO MARTINEZ,

Plaintiff,

V.

JAY JONES, et. al.,

Defendants.

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Civil Action No. 3:06-cv-00480-MEF-VPM

AFFIDAVIT OF NURSE LINDA STEWART

STATE OF ALABAMA

COUNTY OF LEE

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BEFORE ME, the undersigned authority and Notary Public in and for said County and State at large, personally appeared Linda Stewart, who being known to me and being by me first duly sworn on oath deposes and says as follows:

1. My name is Linda Stewart. I am over the age of nineteen and competent to execute this affidavit.

2. I have been employed as a nurse with the Lee County Detention Facility for over five years. I am a Licensed Practical Nurse (L.P.N.) and have been licensed for over twenty-years, having served as a nurse in the ICU and CCU in Cobb Hospital Emergency Room for fifteen-years. I taught Nursing Assistance Clinicals for two years at Career Institute. I collected medical information for the law firm of Bellamy and Jones for

three years, and I was employed as the personal nurse for Doctor Hoffman, in Phenix City, Alabama, for twelve years, prior to my coming to the Lee County Detention Facility.

3. I am familiar with the Plaintiff Antonio Martinez due to his incarceration in the Lee County Detention Facility.

4. I have complied with all policies and procedures of the Lee County Detention Facility. I am not aware of nor have I authorized or allowed any deviation from said policies and procedures.

5. All medical request forms are forwarded to the medical staff to be answered, and a copy of the answered request form is filed in that inmate's medical file. The Plaintiff was aware of the request procedure as evidenced by the request forms he has filed that were answered and are present in his inmate file.


6. The Plaintiff was also aware of the procedure for filing grievances as evidenced by his grievance, which he specifically designated as such, dated May 15, 2006. This grievance did not relate to the allegations made the basis of his Complaint.

7. All medical records attached to the Special Report are true and accurate copies of medical documents kept in the Plaintiff's medical file by me in the ordinary course of my business. I am the custodian of these records.

8. I swear, to the best of my present knowledge and information that the above statements are true, that I am competent to make this affidavit and that the above statements were made by drawing from my personal knowledge of the situation


LINDA STEWART

SWORN TO and SUBSCRIBED before me this 15 day of August, 2006.


NOTARY PUBLIC
My Commission Expires: FEB. 10, 2007